

February 5, 2015

**State Implementation Plan (SIP) Program Manager, Air Quality Planning Unit, OPRA
GS-0819-12/13 or GS-0028-12/13
Justification for External Backfill for Vice-Pratt**

Steve Pratt, a senior level staff engineer in the Air Quality Planning (AQP) Unit told management on January 30th of his plans to retire in early March 2015. This staff's retirement was unknown and not taken into account during the recent resource planning effort.

As a senior staff engineer, Mr. Pratt's work on the point source control technology portion of Utah's PM_{2.5} attainment SIP is key to resolving technical issues with the state. Resolution of these issues is needed in 2015, so Utah can submit a revised attainment SIP that we would need to approve in 2016.

At this time we must act on the PM_{2.5} SIP we have in-house by June 2016 to meet the Clean Air Act deadline. This means we would have to disapprove it. A disapproval starts a clock for implementing highway and offset sanctions; and for the Region to develop a Federal Implementation Plan (FIP). Sanctions and FIPs do not make for good state relationships.

Backfill of the Vice-Pratt position now would allow the Air Program to continue to meet its commitments to the state of Utah to resolve technical issues in 2015 for the state's PM_{2.5} attainment SIP, as well as a December 2014 Regional commitment to also resolve technical issues related to the state's PM₁₀ maintenance SIP.

Mr. Pratt is also the SIP Program Manager for Wyoming. His work on Wyoming's backlogged SIPs is key to the Air Program meeting our 4-Year SIP Management Plan commitments with Wyoming. The elimination of the backlogged SIPs is a high priority for the Office of Air and Radiation.

The AQP Unit has an upcoming retirement of a senior level staff in August 2015. This staff is working on a high priority emissions inventory (EI) project for the Uinta Basin with multiple external stakeholders. The Uinta Basin's elevated wintertime ozone levels is a top concern for Region 8 due largely to the fact that much of the area is within the Uintah and Ouray Indian Reservation and under EPA jurisdiction. The EI is needed for our development of an attainment FIP, which will be triggered by the designations for the new ozone NAAQS (finalized in October 2015).

The recent approval to fill a GS-7/9 EPS position for doing the processing work associated with SIPs will remove these administrative duties from the senior GS-13 SIP staff. We intend to use the new available workload time to provide our states with timely senior level review, technical guidance, and assistance as the states develop new SIP submittals. Our inability to properly provide assistance and guidance in the past has created endless submittals of SIPs that we cannot approve, causing Air Program staff and management a significant amount of time to research, discuss with HQ's, and brief upper management about the issue(s). SIPs that are approvable take much less resources and time to process.

Backfilling this vacancy now may help to alleviate a future need to backfill the upcoming staff retirement in August 2015.

We currently have an external hiring certificate that is open until April 20th that we can use to hire a qualified engineer to fill this position; thus, saving time and resources initiating a new hiring process.